

**IN THE UNITED STATES DISTRICT  
COURT FOR THE EASTERN DISTRICT  
OF TEXAS MARSHALL DIVISION**

**OPTIS WIRELESS TECHNOLOGY, LLC AND  
PANOPTIS PATENT MANAGEMENT, LLC,**

**Plaintiffs,**

**v.**

**BLACKBERRY LIMITED, et al.,**

**Defendants.**

**Civ. A. No. 2:16-cv-62-JRG-RSP  
(Lead Case)**

**JURY TRIAL REQUESTED**

**SECOND JOINT MOTION TO STAY ALL DEADLINES AND  
NOTICE OF SETTLEMENT**

Plaintiffs Optis Wireless Technology, LLC and PanOptis Patent Management, LLC (collectively, “PanOptis”) and Defendants BlackBerry Limited and BlackBerry Corporation (collectively, “BlackBerry”) respectfully request that the Court extend the current stay of all unreached deadlines by an additional 14 days until April 26, 2017. As represented in the parties’ prior joint motion (Dkt. 115), all matters in controversy between the parties have been settled, in principle, but the parties respectfully request an additional 14 days so that appropriate dismissal papers may be submitted after the final agreement has been executed. The Court previously entered a stay until April 12, 2017 (Dkt. 116).<sup>1</sup> The parties have been diligently and collaboratively working to draft and execute a final written agreement. However, due to the complex and multi-faceted nature of the agreement and the need for the parties to investigate and confirm various underlying factual details, the parties request the additional time to reduce their agreement to writing. The parties respectfully submit that there is good cause to stay all

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<sup>1</sup> The Court also ordered the parties to appear at 9:00 a.m. on April 13, 2017 for a status conference if a motion to dismiss has not been filed by April 12. Dkt. 116.

deadlines an additional 14 days in view of the settlement agreement in principle. A proposed order is attached.

April 10, 2017

Respectfully submitted,  
/s/ Eric S. Tautfest

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and Optis Wireless Technology, LLC**

**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who have consented to electronic service on this the 10<sup>th</sup> day of April, 2017.

/s/ Eric S. Tautfest